FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR MANAGEMENT

Courier Kendallville, Inc.
2500 Marion Drive
Kendallville, Indiana 46755

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F113-12093-00021	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a commercial printing plant that manufactures adhesive bound and saddlewire bound books and performs the following processes: printing, drying, binding and finishing.

Authorized individual:	Joseph L. Brennan
Source Address:	2500 Marion Drive, Kendallville, Indiana 46755
Mailing Address:	2500 Marion Drive, Kendallville, Indiana 46755
Phone Number:	(219) 347-3044
SIC Code:	2752
Source Location Status:	Noble
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD or Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 16, with a maximum line speed of 1265 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 16 Upper Dryer and Hantscho Mark 16 Lower Dryer, each with a maximum heat input rate of 5.8 MMBtu/hr, exhausting to one (1) stack, identified as 6;

(b) One (1) heat set web offset lithographic printing press (consisting to four (4) printing units), identified as M850, with a maximum line speed of 1600 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M850 Upper Dryer and Harris M850 Lower Dryer, each with a maximum heat input rate of 4.4 MMBtu/hr, exhausting to one (1) stack, identified as Oxy 1;

(c) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 6, with a maximum line speed of 950 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 6 Upper Dryer and Hantscho Mark 6 Lower Dryer, each with a maximum heat input rate of 4.44 MMBtu/hr, exhausting to one (1) stack, identified as 2;

(d) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units and the addition of another four (4) printing units), identified as M130, with a maximum line speed of 1264 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M850 Upper Dryer and Harris M850 Lower Dryer, each with a maximum heat input rate of 4.44 MMBtu/hr, exhausting to one (1) stack, identified as Oxy 1;

(e) One (1) nonheat set sheetfed offset printing press (consisting of four (4) printing units), identified as Heidelberg Sheetfed Press, with a maximum line speed of 400 feet per minute and a maximum printing width of 39.5 inches;

(f) One (1) sheetfed UV Coater with a maximum line speed of 400 feet per minute and a maximum printing width of 39.5 inches; and

(g) One (1) regenerative thermal oxidizer, identified as Millenium, using natural gas as a supplementary fuel at a maximum heat input rate of 2.29 MMBtu/hr, exhausting through one (1) stack, identified as Oxy 1. The oxidizer has a minimum temperature of 1,600 F and is used to control VOC emissions from units M130 and M850.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(1) Six (6) natural gas-fired space heaters, each with a maximum heat input rate of 0.15 MMBtu/hr;
(2) Two (2) natural gas-fired air make-up units, with a maximum heat input rate of 0.18 MMBtu/hr and 0.15 MMBtu/hr, respectively;
(3) One (1) natural gas-fired boiler, with a maximum heat input rate of 3.0 MMBtu/hr;

(b) The following VOC storage containers:

(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;

(2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;

(c) Cleaners and solvents characterized as follows:

(1) Having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100 F) or;
(2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 C (68 F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;

(d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;

(e) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;

(f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;

(g) Paved and unpaved roads and parking lots with public access;

(h) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;

(i) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP:

(1) The cleaning solvent used on the UV coater;

(2) One (1) film cleaner used in the plating room;

(j) Other activities or categories not previously indentified:

(1) Three (3) binding operations, identified as Fox Stitcher, Norm Binder and Kolbus Binder, each with a maximum capacity of 560 pounds of paper per hour;

(2) Two (2) binding operations, identified as Norm and Kolbus, each with a maximum capacity of 560 pounds per hour;

(3) Film processor used to develop black and white film; and

(4) Plate processor used to develop printing plates.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

(a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, then the Permittee must furnish record directly to the U. S. EPA. The Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAM may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAM, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAM, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAM, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
within ten (10) calendar days from the date of the discovery of the deviation, except for the failure to perform the monitoring or record the information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(2) If IDEM, OAM upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by a reasonable deadline specified in writing by IDEM, OAM, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1) only if a certification is required by the terms of the applicable rule.

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and after submittal of the following additional information:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAM or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the applicable provisions of 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter at reasonable times upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements;

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-8-5(a)(4)]; and

(f) Nothing in this permit shall be constructed to limit the Permittee's right, to the extent allowed by law, to obtain duplicate or split samples.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.24 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

(a) The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.

(b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if failure to commence construction of the emission unit within eighteen (18) months from the date of issuance of the permit, or if during the construction of work is suspended for a continuous period of one (1) year or more.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control

The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAM of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.11 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour (this time frame is determined on a case by case basis) until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days from the date of issuance of this permit.

The ERP does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(c) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

(A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps shall constitute a violation of the permit.

(c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned or is returning to operating within “normal” parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.

(f) If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.

(1) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent of the operating time in any quarter.

(2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the corrective actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline.

(c) IDEM, OAM reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 16, with a maximum line speed of 1265 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 16 Upper Dryer and Hantscho Mark 16 Lower Dryer, each with a maximum heat input rate of 5.8 MMBtu/hr, exhausting to one (1) stack, identified as 6; and

(b) One (1) heat set web offset lithographic printing press (consisting to four (4) printing units), identified as M850, with a maximum line speed of 1600 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M130 Upper Dryer and Harris M130 Lower Dryer, each with a maximum heat input rate of 4.0 MMBtu/hr, exhausting to one (1) stack, identified as Oxy 1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 FESOP Limit [326 IAC 2-8-4][326 IAC 8-1-6]

VOC emissions from the printing press M850 and printing press M130 (listed in Section D.2) shall be controlled by the regenerative thermal oxidizer, identified as Millenium, that maintains a minimum overall control efficiency of 95.0%. This limit will render the requirements of 326 IAC 2-7 not applicable.

D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

Any change or modification which would increase the potential to emit VOC from press Mark 16 to twenty-five (25) tons per year or more shall obtain prior approval from IDEM, OAM and shall be subject to the requirements of 326 IAC 8-1-6.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for printing press M850 and its control device.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee shall perform VOC testing on the 2.29 MM Btu/hr thermal oxidizer, identified as Millenium, by a method approved by the Commissioner, to determine the minimum operating temperature that will achieve 95.0% overall efficiency for this oxidizer. In addition to these requirements and pursuant to 326 IAC 2-1.1-11, IDEM may require compliance testing at any time to assure compliance with all applicable requirements.

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the ink, coating, fountain solution and cleaning solvent manufacturers. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.6 VOC Emissions

The one (1) regenerative thermal oxidizer, identified as Millenium, shall be in operation at all times when the printing press (M850) is in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.7 Volatile Organic Compound Control

When operating the printing press M850 and the printing press M130 (listed in Section D.2), the one (1) regenerative thermal oxidizer shall maintain a minimum operating temperature of 1,600ºF or a temperature determined in the most recent compliance stack tests to maintain at least 95.0% overall control efficiency. The temperature of the burner of the thermal oxidizer shall be continuously monitored and recorded whenever any of the facilities are in operation. Compliance with this condition shall deem 326 IAC 8-1-6 satisfied.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.8 Record Keeping Requirements

(a) The Permittee shall maintain records of the materials used that contain any VOCs. The records shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in condition D.1.1. The records shall contain, as a minimum, the following information:

(1) The weight of VOC-containing material used, including purchase orders and invoices necessary to verify the type and amount used.

(2) The VOC content (weight and volume percent) of each material used.

(3) The weight of VOCs emitted for each compliance period, considering capture and destruction (or removal) efficiency.

(4) Operational parameters of the VOC emission control equipment, considering capture and destruction (or removal) efficiency.

(5) Operational parameters of the VOC emission control equipment, such as:

(a) Data used to establish the capture and destruction (or removal) efficiencies at the time of the initial compliance test; and

(b) Temperature readings.

(b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2.

(1) The amount and VOC content of each ink, fountain solution, coating material and cleaning solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to inks and fountain solutions and those used as cleanup solvents;

(2) A monthly log of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(c) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 6, with a maximum line speed of 950 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 6 Upper Dryer and Hantscho Mark 6 Lower Dryer, each with a maximum heat input rate of 4.44 MMBtu/hr, exhausting to one (1) stack, identified as 2;

(d) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units and the addition of another four (4) printing units), identified as M130, with a maximum line speed of 1264 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M130 Upper Dryer and Harris M130 Lower Dryer, each with a maximum heat input rate of 4.0 MMBtu/hr, exhausting to one (1) stack, identified as Oxy 1;

(e) One (1) nonheat set sheetfed offset printing press (consisting of four (4) printing units), identified as Heidelberg Sheetfed Press, with a maximum line speed of 400 feet per minute and a maximum printing width of 39.5 inches;

(f) One (1) sheetfed UV Coater with a maximum line speed of 400 feet per minute and a maximum printing width of 39.5 inches; and

(g) One (1) regenerative thermal oxidizer, identified as Millenium, using natural gas as a supplementary fuel at a maximum heat input rate of 2.29 MMBtu/hr, exhausting through one (1) stack, identified as Oxy 1. The oxidizer has a minimum temperature of 1,600 F and is used to control VOC emissions from units M130 and M850.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

Construction Conditions

General Construction Conditions

D.2.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

D.2.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.2.3 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Operation Conditions

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.4 FESOP Limit [326 IAC 2-8-4][326 IAC 8-1-6]

VOC emissions from the printing press M130 and printing press M850 shall be controlled by the regenerative thermal oxidizer, identified as Millenium, that maintains a minimum overall control efficiency of 95.0%. This limit will render the requirements of 326 IAC 2-7 not applicable.

D.2.5 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

Any change or modification which would increase the potential to emit VOC from press Mark 6 or the Heidelberg Sheetfed Press to twenty-five (25) tons per year or more, respectively, shall obtain prior approval from IDEM, OAM and shall be subject to the requirements of 326 IAC 8-1-6.

D.2.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for printing press M130 and its control device.

Compliance Determination Requirements

D.2.7 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee shall perform VOC testing on the 2.29 MM Btu/hr thermal oxidizer, identified as Millenium, by a method approved by the Commissioner, to determine the minimum operating temperature that will achieve 95.0% overall efficiency for this oxidizer. In addition to these requirements and pursuant to 326 IAC 2-1.1-11, IDEM may require compliance testing at any time to assure compliance with all applicable requirements.

D.2.8 Volatile Organic Compounds

Compliance with the VOC content and usage limitations contained in Condition D.2.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the ink, fountain solution, coating and cleaning solvent manufacturers. However, IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.9 VOC Emissions

The one (1) regenerative thermal oxidizer, identified as Millenium, shall be in operation at all times when the printing press (M130) is in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.10 Volatile Organic Compound Control

When operating the printing press M130 and the printing press M850 (listed in Section D.1), the one (1) regenerative thermal oxidizer shall maintain a minimum operating temperature of 1,600ºF or a temperature determined in the most recent compliance stack tests to maintain at least 95.0% overall control efficiency. The temperature of the burner of the thermal oxidizer shall be continuously monitored and recorded whenever any of the facilities are in operation. Compliance with this condition shall deem 326 IAC 8-1-6 satisfied.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.11 Record Keeping Requirements

(a) The Permittee shall maintain records of the materials used that contain any VOCs. The records shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in condition D.2.4. The records shall contain, as a minimum, the following information:

(1) The weight of VOC-containing material used, including purchase orders and invoices necessary to verify the type and amount used.

(2) The VOC content (weight and volume percent) of each material used.

(3) The weight of VOCs emitted for each compliance period, considering capture and destruction (or removal) efficiency.

(4) Operational parameters of the VOC emission control equipment, considering capture and destruction (or removal) efficiency.

(5) Operational parameters of the VOC emission control equipment, such as:

(a) Data used to establish the capture and destruction (or removal) efficiencies at the time of the initial compliance test; and

(b) Temperature readings.

(b) To document compliance with Condition D.2.5, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.5.

(1) The amount and VOC content of each ink, fountain solution, coating material and cleaning solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A monthly log of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.12 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.4 and D.2.5 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:
(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
(1) Six (6) natural gas-fired space heaters, each with a maximum heat input rate of 0.15 MMBtu/hr;
(2) Two (2) natural gas-fired air make-up units, with a maximum heat input rate of 0.18 MMBtu/hr and 0.15 MMBtu/hr, respectively; and
(3) One (1) natural gas-fired boiler, with a maximum heat input rate of 3.0 MMBtu/hr.
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Boilers

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-4(a) (Particulate Matter Emission Limitations for Sources of Indirect Heating), indirect heating units which have 10 MMBtu/hr heat input or less and which began operation after September 21, 1983, shall in no case exceed 0.6 lb/MMBtu heat input. Therefore PM emissions from the 3 MMBtu/hr boiler shall be limited to 0.6 lb/MMBtu heat input.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Courier Kendallville, Inc.
Source Address: 2500 Marion Drive, Kendallville, Indiana 46755
Mailing Address: 2500 Marion Drive, Kendallville, Indiana 46755
FESOP No.: F113-12093-00021

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT

AIR COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Courier Kendallville, Inc.
Source Address: 2500 Marion Drive, Kendallville, Indiana 46755
Mailing Address: 2500 Marion Drive, Kendallville, Indiana 46755
FESOP No.: F113-12093-00021

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-8-4(3)(C) C The Permittee must submit notice in writing within ten (**10**) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Courier Kendallville, Inc.
Source Address: 2500 Marion Drive, Kendallville, Indiana 46755
Mailing Address: 2500 Marion Drive, Kendallville, Indiana 46755
FESOP No.: F113-12093-00021

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (eg. Permit Condition D.1.3)	**Number of Deviations**	**Date of each Deviation**

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for Federally Enforceable State Operating Permit (FESOP)

Source Name: Courier Kendallville, Inc.
Source Location: 2500 Marion Drive, Kendallville, Indiana 46755
SIC Code: Noble
County: 2752
Operation Permit No.: F113-12093-00021
Permit Reviewer: Nishat Hydari/EVP

On July 15, 2000, the Office of Air Management (OAM) had a notice published in the News Sun, Kendallville, Indiana, stating that Courier Kendallville, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) for the construction and operation of a commercial printing plant that manufactures adhesive bound and saddlewire bound books and performs the following processes: printing, drying, binding and finishing. The notice also stated that OAM proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

On August 14, 2000, Joseph L. Brennan, Vice President of Engineering at Courier submitted comments on the proposed FESOP. The summary of the comments and corresponding responses is as follows (bolded language has been added and language with a line through it has been deleted):

Comment 1

The list of permitted emission units and pollution control equipment in Sections A.2, D.1, and D.2 of the permit, and on pages 1 through 2 of the Technical Support Document, is not accurate.

a. The list of heatset presses should be revised. With the replacement of the four unit Hantscho Mark 6 and addition of 4 units to the M-130, there will be a total of four (4) heatset web offset presses, the Harris M850, Harris M130, Hantscho Mark 16, and the replacement Hantscho Mark 6. Each of the presses has either 4 or 8 units, two webs, and two dryers.

b. The portable ink tanks and lubricating oil containers are not used to store HAPs.

c. The Norm and Kolbus bindery lines do not emit any HAPs and should be removed from paragraph (j) in Sections A.3 and on page 3 of 9 of the Technical Support Document.

d. Section A.2 should be modified by removing the entire section and replacing it with the following:

Emission Units and Pollution Control Equipment Summary

The stationary source consists of the following permitted emission units and pollution control devices:

(a) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 6, with a maximum line speed of 950 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 6 Upper Dryer and Hantscho Mark 6 Lower Dryer, each with a maximum heat input rate of 4.44 million (MM) British thermal units per hour (Btu/hr), exhausting to one (1) stack, identified as 2;

(b) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 16, with a maximum line speed of 1,265 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 16 Upper Dryer and Hantscho Mark 16 Lower Dryer, each with a maximum heat input rate of 5.8 million (MM) British thermal units per hour (Btu/hr), exhausting to one (1) stack, identified as 6;

(c) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as M850, with a maximum line speed of 1600 feet per minute and a maximum printing width of 37.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M850 Upper Dryer and Harris M850 Lower Dryer, each with a maximum heat input rate of 4.44 MMBtu/hr, exhausting to one (1) stack, identified as Oxy 1, utilizing a regenerative thermal oxidizer for VOC control;

(d) One (1) heat set web offset lithographic printing press (consisting of eight (8) printing units), identified as M130, with a maximum line speed of 1264 feet per minute and a maximum printing width of 37.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M130 Upper Dryer and Harris M130 Lower Dryer, each with a maximum heat input rate of 4.0 MMBtu/hr, exhausting to one (1) stack, identified as Oxy 1; utilizing a regenerative thermal oxidizer for VOC control.

e. “Facility Descriptions [326 IAC 2.8.4(10)]” on Sections D.1, Sections (a) through (e), should be deleted and replaced with the following:

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 6, with a maximum line speed of 950 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 6 Upper Dryer and Hantscho Mark 6 Lower Dryer, each with a maximum heat input rate of 4.44 million (MM) British thermal units per hour (Btu/hr), exhausting to one (1) stack, identified as 2;

(b) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 16, with a maximum line speed of 1,265 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 16 Upper Dryer and Hantscho Mark 16 Lower Dryer, each with a maximum heat input rate of 5.8 million (MM) British thermal units per hour (Btu/hr), exhausting to one (1) stack, identified as 6;

(c) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as M850, with a maximum line speed of 1600 feet per minute and a maximum printing width of 37.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M850 Upper Dryer and Harris M850 Lower Dryer, each with a maximum heat input rate of 4.44 MMBtu/hr, exhausting to one (1) stack, identified as Oxy 1, utilizing a regenerative thermal oxidizer for VOC control;

(d) One (1) heat set web offset lithographic printing press (consisting of eight (8) printing units), identified as M130, with a maximum line speed of 1264 feet per minute and a maximum printing width of 37.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M130 Upper Dryer and Harris M130 Lower Dryer, each with a maximum heat input rate of 4.0 MMBtu/hr, exhausting to one (1) stack, identified as Oxy 1; utilizing a regenerative thermal oxidizer for VOC control.

f. Section D.2 Sections (g)-(k) should be deleted and replaced with the following:

(a) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 6, with a maximum line speed of 950 feet per minute and a maximum printing width of 35.5 inches;

(b) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units and the addition of another four (4) printing units), identified as M130, with a maximum line speed of 1264 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control;

(c) One (1) nonheat set sheetfed offset printing press (consisting of four (4) printing units), identified as Heidelberg Sheetfed Press, with a maximum line speed of 400 feet per minute and a maximum printing width of 39.5 inches;

(d) One (1) sheetfed UV Coater with a maximum line speed of 400 feet per minute and a maximum printing width of 39.5 inches; and

(e) One (1) regenerative thermal oxidizer, identified as Millenium, using natural gas as a supplementary fuel at a maximum heat input rate of 2.29 MMBtu/hr, exhausting through one (1) stack, identified as Oxy 1. The oxidizer has a minimum temperature of 1,600 F and is used to control VOC emissions from units M130 and M850.

g. Changes to pages 1 through 3 of the Technical Support Document should be rewritten as follows: “Permitted Emission Units and Pollution Control Equipment”, Sections (a)-(f) should be deleted and replaced with the following:

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 6, with a maximum line speed of 950 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 6 Upper Dryer and Hantscho Mark 6 Lower Dryer, each with a maximum heat input rate of 4.44 million (MM) British thermal units per hour (Btu/hr), exhausting to one (1) stack, identified as 2;

(b) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 16, with a maximum line speed of 1,265 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 16 Upper Dryer and Hantscho Mark 16 Lower Dryer, each with a maximum heat input rate of 5.8 million (MM) British thermal units per hour (Btu/hr), exhausting to one (1) stack, identified as 6;

(c) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as M850, with a maximum line speed of 1600 feet per minute and a maximum printing width of 37.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M850 Upper Dryer and Harris M850 Lower Dryer, each with a maximum heat input rate of 4.44 MMBtu/hr, exhausting to one (1) stack, identified as Oxy 1; utilizing a regnerative thermal oxidizer for VOC control;

(d) One (1) heat set web offset lithographic printing press (consisting of eight (8) printing units), identified as M130, with a maximum line speed of 1264 feet per minute and a maximum printing width of 37.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M130 Upper Dryer and Harris M130 Lower Dryer, each with a maximum heat input rate of 4.0 MMBtu/hr, exhausting to one (1) stack, identified as Oxy 1; utilizing a regenerative thermal oxidizer for VOC control.

In addition, the following modifications should be made to page 2 of the TSD (suggested additions are highlighted or bold type).

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-8-4(11):

(a) One (1) heat set web offset lithographic printing press (consisting of **four (4)** printing units), identified as Mark 6, with a maximum line speed of 950 feet per minute and a maximum printing width of 35.5 inches;

(b) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units and the additional of another four (4) printing units), identified as M130, with a maximum line speed of 1264 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control;

(c) One (1) nonheat set sheetfed offset printing press (consisting of four (4) printing units), identified as Heidelberg Sheetfed Press, with a maximum line speed of **400 feet** per minute and a maximum printing width of 39.5 inches; and

(d) One (1) sheetfed UV Coater with a maximum line speed of 400 feet per minute and a maximum printing width of 39.5 inches. The remainder of the Section remains unchanged.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

Response 1

The following unit description changes have been made to Section A.2, Section A.3 and the facility description box in Sections D.1 and D.2. The emissions from the Heidelberg Sheetfed Press were re-calculated and the revised calculation sheet (Page 6 of 8 of TSD Addendum App A) is attached. :

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) heat set web offset lithographic printing press (consisting of ~~two (2)~~ **four (4)** printing units), identified as Mark 16, with a maximum line speed of 1265 feet per minute and a maximum printing width of 35.5 inches~~;~~**. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 16 Upper Dryer and Hantscho Mark 16 Lower Dryer, each with a maximum heat input rate of 5.8 MMBtu/hr, exhausting to one (1) stack, identified as 6;**

(b) One (1) heat set web offset lithographic printing press (consisting to four (4) printing units), identified as M850, with a maximum line speed of 1600 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control~~;~~**. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M850 Upper Dryer and Harris M850 Lower Dryer, each with a maximum heat input rate of 4.4 MMBtu/hr, exhausting to one (1) stack, identified as Oxy 1;**

~~(c) Two (2) natural gas-fired dryers, identified as Hantscho Mark 6 Upper Dryer and Hantscho Mark 6 Lower Dryer, each with a maximum heat input rate of 4.44 million (MM) British thermal units per hour (Btu/hr), exhausting to one (1) stack, identified as 2;~~

~~(d) Two (2) natural gas-fired dryers, identified as Hantscho Mark 16 Upper Dryer and Hantscho Mark 16 Lower Dryer, each with a maximum heat input rate of 5.8 million (MM) British thermal units per hour (Btu/hr), exhausting to one (1) stack, identified as 6;~~

~~(e) Two (2) natural gas-fired dryers, identified as Harris M130 Upper Dryer and Harris M130 Lower Dryer, each with a maximum heat input rate of 4.0 MMBtu/hr, exhausting to one (1) stack, identified as Oxy 1;~~

~~(f) Two (2) natural gas-fired dryers, identified as Harris M850 Upper Dryer and Harris M850 Lower Dryer, each with a maximum heat input rate of 4.44 MMBtu/hr, exhausting to one (1) stack, identified as Oxy 1;~~

(~~g~~**c**) One (1) heat set web offset lithographic printing press (consisting of ~~two (2)~~ **four (4)** printing units), identified as Mark 6, with a maximum line speed of 950 feet per minute and a maximum printing width of 35.5 inches~~;~~**. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 6 Upper Dryer and Hantscho Mark 6 Lower Dryer, each with a maximum heat input rate of 4.44 MMBtu/hr, exhausting to one (1) stack, identified as 2;**

(~~h~~**d**) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units and the addition of another four (4) printing units), identified as M130, with a maximum line speed of 1264 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control~~;~~**. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M850 Upper Dryer and Harris M850 Lower Dryer, each with a maximum heat input rate of 4.44 MMBtu/hr, exhausting to one (1) stack, identified as Oxy 1;**

(~~i~~**e**) One (1) nonheat set sheetfed offset printing press (consisting of four (4) printing units), identified as Heidelberg Sheetfed Press, with a maximum line speed of ~~1600~~ **400** feet per minute and a maximum printing width of ~~40.125~~ **39.5** inches;

(~~j~~**f**) One (1) sheetfed UV Coater **with a maximum line speed of 400 feet per minute and a maximum printing width of 39.5 inches**; and

(~~k~~**g**) One (1) regenerative thermal oxidizer, identified as Millenium, using natural gas as a supplementary fuel at a maximum heat input rate of 2.29 MMBtu/hr, exhausting through one (1) stack, identified as Oxy 1. The oxidizer has a minimum temperature of 1,600 F and is used to control VOC emissions from units M130 and M850.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(1) Six (6) natural gas-fired space heaters, each with a maximum heat input rate of 0.15 MMBtu/hr;
(2) Two (2) natural gas-fired air make-up units, with a maximum heat input rate of 0.18 MMBtu/hr and 0.15 MMBtu/hr, respectively;
(3) One (1) natural gas-fired boiler, with a maximum heat input rate of 3.0 MMBtu/hr;

(b) The following VOC ~~and HAP~~ storage containers:

(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;

(2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;

(c) Cleaners and solvents characterized as follows:

(1) Having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100 F) or;
(2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 C (68 F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;

(d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;

(e) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;

(f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;

(g) Paved and unpaved roads and parking lots with public access;

(h) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;

(i) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP:

(1) The cleaning solvent used on the UV coater;

(2) One (1) film cleaner used in the plating room;

~~(j) Any unit emitting greater than 1 pound per day but less than 12.5 pounds per day or 2.5 ton per year of any combination of HAPs:~~

~~(1) Two (2) binding operations, identified as Norm and Kolbus, each with a maximum capacity of 560 pound per hour;~~

(~~k~~**j**) Other activities or categories not previously indentified:

(1) Three (3) binding operations, identified as Fox Stitcher, Norm Binder and Kolbus Binder, each with a maximum capacity of 560 pounds of paper per hour;

(2) Two (2) binding operations, identified as Norm and Kolbus, each with a maximum capacity of 560 pounds per hour;

(3) Film processor used to develop black and white film; and

(4) Plate processor used to develop printing plates.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) One (1) heat set web offset lithographic printing press (consisting of ~~two (2)~~ **four (4)** printing units), identified as Mark 16, with a maximum line speed of 1265 feet per minute and a maximum printing width of 35.5 inches~~;~~**. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 16 Upper Dryer and Hantscho Mark 16 Lower Dryer, each with a maximum heat input rate of 5.8 MMBtu/hr, exhausting to one (1) stack, identified as 6; and**

(b) One (1) heat set web offset lithographic printing press (consisting to four (4) printing units), identified as M850, with a maximum line speed of 1600 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control~~;~~**. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M130 Upper Dryer and Harris M130 Lower Dryer, each with a maximum heat input rate of 4.0 MMBtu/hr, exhausting to one (1) stack, identified as Oxy 1.**

~~(c) Two (2) natural gas-fired dryers, identified as Hantscho Mark 6 Upper Dryer and Hantscho Mark 6 Lower Dryer, each with a maximum heat input rate of 4.44 million (MM) British thermal units per hour (Btu/hr), exhausting to one (1) stack, identified as 2;~~

~~(d) Two (2) natural gas-fired dryers, identified as Hantscho Mark 16 Upper Dryer and Hantscho Mark 16 Lower Dryer, each with a maximum heat input rate of 5.8 million (MM) British thermal units per hour (Btu/hr), exhausting to one (1) stack, identified as 6;~~

~~(e) Two (2) natural gas fired dryers, identified as Harris M130 Upper Dryer and Harris M130 Lower Dryer, each with a maximum heat input rate of 4.0 MMBtu/hr, exhausting to one (1) stack, identified as Oxy 1; and~~

~~(f) Two (2) natural gas fired dryers, identified as Harris M850 Upper Dryer and Harris M850 Lower Dryer, each with a maximum heat input rate of 4.44 MMBtu/hr, exhausting to one (1) stack, identified as Oxy 1.~~

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

SECTION D.2 FACILITY CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(~~g~~**c**) One (1) heat set web offset lithographic printing press (consisting of ~~two (2)~~ **four (4)** printing units), identified as Mark 6, with a maximum line speed of 950 feet per minute and a maximum printing width of 35.5 inches~~;~~**. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 6 Upper Dryer and Hantscho Mark 6 Lower Dryer, each with a maximum heat input rate of 4.44 MMBtu/hr, exhausting to one (1) stack, identified as 2;**

(~~h~~**d**) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units and the addition of another four (4) printing units), identified as M130, with a maximum line speed of 1264 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control~~;~~**. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M130 Upper Dryer and Harris M130 Lower Dryer, each with a maximum heat input rate of 4.0 MMBtu/hr, exhausting to one (1) stack, identified as Oxy 1;**

(~~i~~**e**) One (1) nonheat set sheetfed offset printing press (consisting of four (4) printing units), identified as Heidelberg Sheetfed Press, with a maximum line speed of ~~1600~~ **400** feet per minute and a maximum printing width of ~~40.125~~ **39.5** inches;

(~~j~~**f**) One (1) sheetfed UV Coater **with a maximum line speed of 400 feet per minute and a maximum printing width of 39.5 inches**; and

(~~k~~**g**) One (1) regenerative thermal oxidizer, identified as Millenium, using natural gas as a supplementary fuel at a maximum heat input rate of 2.29 MMBtu/hr, exhausting through one (1) stack, identified as Oxy 1. The oxidizer has a minimum temperature of 1,600 F and is used to control VOC emissions from units M130 and M850.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

The following revisions have been made to the Technical Support Document under the Permitted Emission Units and Pollution Control Equipment section, the New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval section and the Insignificant Activities section (**bolded** language has been added, the language with a ~~line~~ through it has been deleted). The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) heat set web offset lithographic printing press (consisting of ~~two (2)~~ **four (4)** printing units), identified as Mark 16, with a maximum line speed of 1265 feet per minute and a maximum printing width of 35.5 inches~~;~~**, The press is equipped with two (2) natural gas-fired dryers, identified as Hanstcho Mark 16 Upper Dryer and Hantscho Mark 16 Lower Dryer, each with a maximum heat input rate of 5.8 MMBtu/hr, exhausting to one (1) stack, identified as 6;**

(b) One (1) heat set web offset lithographic printing press (consisting to four (4) printing units), identified as M850, with a maximum line speed of 1600 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control~~;~~**. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M130 Upper Dryer and Harris M130 Lower Dryer, each with a maximum heat input rate of 4.0 MMBtu/hr, exhausting to one (1) stack, identified as Oxy 1;**

~~(c) Two (2) natural gas-fired dryers, identified as Hantscho Mark 6 Upper Dryer and Hantscho Mark 6 Lower Dryer, each with a maximum heat input rate of 4.44 million (MM) British thermal units per hour (Btu/hr), exhausting to one (1) stack, identified as 2;~~

~~(d) Two (2) natural gas-fired dryers, identified as Hantscho Mark 16 Upper Dryer and Hantscho Mark 16 Lower Dryer, each with a maximum heat input rate of 5.8 million (MM) British thermal units per hour (Btu/hr), exhausting to one (1) stack, identified as 6;~~

~~(e) Two (2) natural gas-fired dryers, identified as Harris M130 Upper Dryer and Harris M130 Lower Dryer, each with a maximum heat input rate of 4.0 MMBtu/hr, exhausting to one (1) stack, identified as Oxy 1; and~~

~~(f) Two (2) natural gas-fired dryers, identified as Harris M850 Upper Dryer and Harris M850 Lower Dryer, each with a maximum heat input rate of 4.44 MMBtu/hr, exhausting to one (1) stack, identified as Oxy 1.~~

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-8-4(11):

(a) One (1) heat set web offset lithographic printing press (consisting of ~~two (2)~~ **four (4)** printing units), identified as Mark 6, with a maximum line speed of 950 feet per minute and a maximum printing width of 35.5 inches~~;~~**. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 6 Upper Dryer and Hantscho Mark 6 Lower Dryer, each with a maximum heat input rate of 4.44 MMBtu/hr, exhausting to one (1) stack, identified as 2;**

(b) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units and the addition of another four (4) printing units), identified as M130, with a maximum line speed of 1264 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control~~;~~**. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M130 Upper Dryer and Harris M130 Lower Dryer, each with a maximum heat input rate of 4.0 MMBtu/hr, exhausting to one (1) stack, identified as Oxy 1;**

(c) One (1) nonheat set sheetfed offset printing press (consisting of four (4) printing units), identified as Heidelberg Sheetfed Press, with a maximum line speed of ~~1600~~ **400** feet per minute and a maximum printing width of ~~40.125~~ **39.5** inches;

(d) One (1) sheetfed UV Coater **with a maximum line speed of 400 feet per minute and a maximum printing width of 39.5 inches**; and

(e) One (1) regenerative thermal oxidizer, identified as Millenium, using natural gas as a supplementary fuel at a maximum heat input rate of 2.29 MMBtu/hr, exhausting through one (1) stack, identified as Oxy 1. The oxidizer has a minimum temperature of 1,600 F and is used to control VOC emissions from units M130 and M850.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(1) Six (6) natural gas-fired space heaters, each with a maximum heat input rate of 0.15 MMBtu/hr;
(2) Two (2) natural gas-fired air make-up units, with a maximum heat input rate of 0.18 MMBtu/hr and 0.15 MMBtu/hr, respectively;
(3) One (1) natural gas-fired boiler, with a maximum heat input rate of 3.0 MMBtu/hr;

(b) The following VOC ~~and HAP~~ storage containers:

(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;

(2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;

(c) Cleaners and solvents characterized as follows:

(1) Having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100 F) or;

(2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 C (68 F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;

(d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;

(e) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;

(f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;

(g) Paved and unpaved roads and parking lots with public access;

(h) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;

(i) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP:

(1) The cleaning solvent used on the UV coater;

(2) One (1) film cleaner used in the plating room;

~~(j) Any unit emitting greater than 1 pound per day but less than 12.5 pounds per day or 2.5 ton per year of any combination of HAPs:~~

~~(1) Two (2) binding operations, identified as Norm and Kolbus, each with a maximum capacity of 560 pound per hour;~~

(~~k~~**j**) Other activities or categories not previously indentified:

(1) Three (3) binding operations, identified as Fox Stitcher, Norm Binder and Kolbus Binder, each with a maximum capacity of 560 pounds of paper per hour;

(2) Two (2) binding operations, identified as Norm and Kolbus, each with a maximum capacity of 560 pounds per hour;

(3) Film processor used to develop black and white film; and

(4) Plate processor used to develop printing plates.

Comment 2

Section B.10 should be modified to reflect that non-conformance with all permit conditions will not necessarily result in enforcement action of permit termination. Revised language does not restrict the authority of IDEM, OAM or USEPA to take any such action when warranted. The revised Section would read (added wording shown in bold lettering):

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, **may be** a violation of the Clean Air Act and may be grounds for:

Response 2

326 IAC 2-8-4(5)(A) specifically requires that the permit contain a provision stating the permittee must comply with all conditions of the FESOP permit and that noncompliance with a condition, except those designated as not federally enforceable, is grounds for enforcement and other actions. The following changes have been made to Section B.10(a).

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, ~~constitutes a violation of the Clean Air Act and~~ is grounds for:

Comment 3

B.15(a) Typographical error in “except” on first line after the IDEM address.

Response 3

The typographical error has been corrected in Condition B.15(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation, ~~except~~ **except** for the failure to perform the monitoring or record the information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

Comment 4

B.17(c) should be changed to ensure that Permittee only needs to respond to reasonable deadlines. New section should read:

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]. If the Permittee submits a timely and complete application for renewal of this permit, the source’s failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by **a reasonable** deadline specified in writing by IDEM, OAM, any additional information identified as needed to process this application.

Response 4

The following changes have been made to Condition B.17(c).

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by ~~the~~ **a reasonable** deadline specified in writing by IDEM, OAM, any additional information identified as needed to process the application.

Comment 5

For clarity of wording B.19(2) (which should be B.19(b)) should be modified to read:

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and **after submittal** of the following information:

Response 5

The following changes have been made to Section B.19(b):

B.19 Operational Flexibility [326 IAC 2-8-15]

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and **after submittal of** the following additional ~~conditions~~ **information**:

Comment 6

Changes should be made in Section B.21(a), and a new Section B.21(f) added to ensure that any government searches are reasonable and that Permittee has the right to collect duplicate samples in the event of dispute. The new sections should read as follows:

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)]
Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter **at reasonable times** upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

B.21(f) Inspection and Entry [326 IAC 2-8-5(a)(2)]
Nothing in this Permit shall limit Permittee's right to obtain duplicate or split samples, or to obtain copies of all records and test and monitoring results and data collected during any inspection or entry by IDEM, OAM or USEPA, or their authorized representatives.

Response 6

IDEM, OAM has statutory (IC 13-14-2-2) and regulatory authority (326 IAC 2-8-5(a)(2)) to enter, inspect and investigate possible violations at any time.

The copies of records, tests, and results are governed by the Indiana Public Records Act under IC 5-14 and to the extent allowed by the statute, the Permittee can seek to obtain copies.

The following changes have been made to Section B.21.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] **[IC 13-14-2-2]**

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; ~~and~~

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-8-5(a)(4)]**; and**

(f) Nothing in this permit shall be constructed to limit the Permittee's right, to the extent allowed by law, to obtain duplicate or split samples.

Comment 7

To avoid potential inconsistency in the permit, allowances for operations under emergency conditions should be explicitly stated throughout the permit. The following revision to Section C.6 is proposed.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]
Except as otherwise provided in this permit, **including allowances for periods of shutdown or non-operation during emergency condition,** all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

Response 7

The statement "except as otherwise provided in the permit" is meant to cover Courier Kendallville, Inc. when the emergency rule would allow them to operate without control equipment. Therefore, no changes will be made to the permit as a result of this comment.

Comment 8

Because of the complexity of operations, Permittee should have sixty (60) days to resolve issues with IDEM, OAM. Consequently, a sixty-day, rather than a 30-day response period should be specified in Section C.13(c), C.16(a), C.18(d) and D.2.12.

Response 8

IDEM, OAM feels thirty (30) days is ample time to submit information required in Sections C.13(c), C.16(a), C.18(d) and D.2.12. All current FESOP permits being issued to other sources too have the same time period of thirty (30) days for the sections specified above. No changes have been made to the permit as a result of this comment.

Comment 9

Compliance testing should only be requested when reasonably necessary. The following revision to Section D.1.4 and D.2.7 is proposed.

D.1.4 Testing Requirments [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]
The Permittee shall perform VOC testing on the 2.29 MM Btu/hr thermal oxidizer, identified as Millenium, by a method approved by the Commissioner, to determine the minimum operating temperature that will achieve 95% overall efficiency for this oxidizer. In addition to these requirements, IDEM may require compliance testing when **reasonably** necessary to determine if the facility is in compliance.

D.2.7 Testing Requirments [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]
The Permittee shall perform VOC testing on the 2.29 MM Btu/hr thermal oxidizer, identified as Millenium, by a method approved by the Commissioner, to determine the minimum operating temperature that will achieve 95.0% overall efficiency for this oxidizer. In addition to these requirements, IDEM may require compliance testing when **reasonably** necessary to determine if the facility is in compliance.

Response 9

The following changes have been made to Section D.1.4 and Section D.2.7.

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee shall perform VOC testing on the 2.29 MM Btu/hr thermal oxidizer, identified as Millenium, by a method approved by the Commissioner, to determine the minimum operating temperature that will achieve 95.0% overall efficiency for this oxidizer. In addition to these requirements **and pursuant to 326 IAC 2-1.1-11**, IDEM may require compliance testing ~~when necessary~~ **at any time** to ~~determine if the facility is in compliance~~ **assure compliance with all applicable requirements**.

D.2.7 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee shall perform VOC testing on the 2.29 MM Btu/hr thermal oxidizer, identified as Millenium, by a method approved by the Commissioner, to determine the minimum operating temperature that will achieve 95.0% overall efficiency for this oxidizer. In addition to these requirements **and pursuant to 326 IAC 2-1.1-11**, IDEM may require compliance testing ~~when necessary~~ **at any time** to ~~determine if the facility is in compliance~~ **assure compliance with all applicable requirements**.

Comment 10

The need for the following conditions is questioned since they are not directly applicable to the operation of the facility:

a. C.4 Incineration of Wastes,
b. C.5 Fugitive Dust Emissions,
c. C.7 Asbestos Abatement Projects,
d. C.13 Emergency Reduction Plans,
e. C.14 Risk Management Plan
f. C.19 Stratospheric Ozone Protection

Response 10

a. C.4 Incineration of Wastes
This condition states, “The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.” The condition is a general prohibition against improper incineration that applies to all sources, whether the source has incinerators or not. Waste material can only be burned in equipment that meets the cited requirements. The condition will not be changed.

b. C.5 Fugitive Dust Emissions
Under 326 IAC 6-4-6(6), fugitive dust from a source caused by adverse meteorological conditions is an exception to this requirement and will not result in a violation. There have been no changes resulting from this comment.

c. C.7 Asbestos Abatement Projects
The Office of Air Management (OAM) includes all applicable requirements contained in Title 326 of the Indiana Air Code (IAC) in the FESOP Operating Permits. Condition C.7 “Asbestos Abatement Projects” is applicable to every source located in Indiana, regardless of operation or potential emissions. The condition will not be changed.

d. C.13 Emergency Reduction Plans
Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission) “All persons responsible for the operation of a source that has the potential to emit one hundred (100) tons per year, or more, of any pollutant shall prepare, and submit to the commissioner, for approval, written emergency reduction plans consistent with safe operating procedures.”

Courier has the potential to emit more than 100 tons per year of VOCs. Thus Condition C.13 Emergency Reduction Plans applies to Courier and will not be removed from the permit.

e. C.14 Risk Management Plan
The Risk Management Plan provision does not state that the Permittee has more than the threshold quantity of a regulated substance. The plan must be submitted if the Permittee may meet the threshold at some time in the future. The condition remains unchanged.

f. C.19 Stratospheric Ozone Protection
40 CFR 82 regulates the handling of ozone-depleting substances such as Freon in a variety of processes and products including domestic and commercial refrigeration and air-conditioning units and portable fire extinguishers. Most sources include one or more subject units. Maintenance or repair of such units has the potential to release substances controlled under these rules. The condition remains unchanged.

Comment 11

The emission limits in D.1.1 and D.1.2 of the FESOP permit needs to be revised to reflect that Courier wants a 25 tons per year annual VOC emission limit per press placed on the Mark 6 and Mark 16 presses. The 145.69 and 152.51 tons per (12) consecutive month period, rolled on a monthly basis is in direct conflict with the limits established in Section C.1. Section C.1 limits total facility emissions to less than 100 tons per year.

The term “coatings” should be revised to “inks” as coatings are not used on these presses. The only coatings used in operations are those used, undiluted, in the UV sheet fed coater. Likewise, the term “dilution solvents” should be revised to “fountain solutions” as dilution solvents are not used for the inks used on these types of presses, but fountain solution with wetting additives is utilized.

They should be revised as follows:

D.1.1 FESOP Limit [326 IAC 2-8-4] [40 CFR 52.21] [326 IAC 8-1-6]
The emissions of VOC, including **inks, fountain solutions**, and cleaning solvents, in printing press **M6 and printing press M16** (listed in Section D.2), shall be limited to **25 and 25** tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively. VOC emissions from the printing press M850 and printing press M130 shall be controlled by the regenerative thermal oxidizer, identified as Millenium, which maintains a minimum overall control efficiency of 95.0%. This limit will render the requirement of **326 IAC 2-2 (Prevention of Significant Deterioration), best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements)**, and 326 IAC 2-7 not applicable.

Response 11

Condition D.1.1 lists the FESOP limit for printing presses M850 and M130. Printing presses Mark 6 and Mark 16 do not need to be limited to less than 25 tons per year because their potential to emit is already less than 25 tons per year. The potential to emit of printing presses M850 and M130 is greater than 25 tons per year and thus they will be limited to less than 25 tons per year to comply with the FESOP limit. The following changes will be made to Section D.1.1.

D.1.1 FESOP Limit [326 IAC 2-8-4][326 IAC 8-1-6]
The usage of VOC, including ~~coatings, dilution solvents,~~ **inks, fountain solutions** and cleaning solvents, in printing press M850 and printing press M130 (listed in Section D.2), shall be limited to ~~145.69~~ **25** and ~~152.51~~ **25** tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively. VOC emissions from the printing press M850 and printing press M130 shall be controlled by the regenerative thermal oxidizer, identified as Millenium, that maintains a minimum overall control efficiency of 95.0%. This limit will render the requirements of 326 IAC 2-7 not applicable.

Comment 12

The preventive maintenance plan requirements in D.1.3 should be revised to reflect that it applies to both the M850 and M130. It should be revised as follows:

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]
A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for printing press**es** M850 **and M130** and **their** control device.

Response 12

Section D.1 contains requirements that are applicable to the emission units listed under the facility description box. The facility description box lists M850 but not M130 (M130 is listed in Section D.2). Therefore, Condition D.1.3 mentions only M850. No changes have been made to the permit as a result of this comment.

Comment 13

Condition D.1.5 of the compliance determination requirements should be revised to expand the source of the data to include the suppliers of the significant input materials such as ink, fountain solution, coatings, and cleaning solvents. It should be revised as follows:

> D.1.5 Volatile Organic Compounds (VOC)
> Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the **ink,** coating, **fountain solution, and cleaning solvent manufacturers**. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Response 13

The following changes have been made to Condition D.1.5.

D.1.5 Volatile Organic Compounds (VOC)

> Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the **ink,** coating**, fountain solution, and cleaning solvent** manufacturer**s**. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Comment 14

Condition D.1.6 of the compliance determination requirements should be revised to include the M130 press. It should be revised as follows:

> D.1.6 VOC Emissions
> The one (1) regenerative thermal oxidizer, identified as Millenium, shall be in operation at all times when the printing presses M850 **and/or M130** are in operation **- except as otherwise provided in this permit, including during periods of oxidizer non-operation caused by emergency conditions**.

Response 14

Section D.1 contains requirements that are applicable to the emission units listed under the facility description box. The facility description box lists M850 but not M130 (M130 is listed in Section D.2). Therefore, Condition D.1.6 mentions only M850.

Please refer to Condition B.14 (Emergency Provisions) for information regarding emergency conditions.

No changes have been made to the permit as a result of this comment.

Comment 15

Condition D.1.7 of the compliance determination requirements should be revised by eliminating the 1600 F minimum operating temperature. Courier requests the flexibility to be allowed to set the operating temperature at the time of testing so that 95% destruction efficiency will be achieved. Monitoring of the unit's temperature should be in the combustion chamber and not the burner. The condition should be revised as follows:

D.1.7 Volatile Organic Compound Control

When operating the printing press M850 and the printing press M130 (listed in Section D.2), the one (1) regenerative thermal oxidizer shall maintain the minimum operating temperature determined in the most recent compliance stack tests to maintain at least 95.0% overall control efficiency. The temperature of the combustion chamber of the thermal oxidizer shall be continuously monitored and recorded whenever any of the facilities are in operation. Compliance with this condition shall deem 326 IAC 8-1-6 satisfied.

Response 15

IDEM, OAM does not feel the need to eliminate the 1600 F minimum operating temperature. OAM feels that 1600 F is a reasonable operating temperature to use until a revised limit is obtained by stack testing. The reason is because in Condition D.1.7 IDEM, OAM is giving Courier the flexibility to be allowed to set the operating temperature at the time of testing so that the 95% destruction efficiency is achieved. This condition is expressed in the first sentence of Condition D.1.7 and states "When operating the printing press M850 and the printing press M130 (listed in Section D.2), the one (1) regenerative thermal oxidizer shall maintain a minimum operating temperature of 1,600ºF or a temperature determined in the most recent compliance stack tests to maintain at least 95.0% overall control efficiency." No changes have been made to the permit as a result of this comment.

Comment 16

Condition D.1.8 should be slightly revised to reflect that records of VOC containing material need not be kept for those materials used in small quantities, less than 25 gallons per year, the weight or volume of material use can be tracked and that the log for each material being used reflect that it shall be maintained on a monthly basis with the dates for each individual material used deleted. This creates a recordkeeping burden that is not commensurate with the environmental risk.

D.1.8 Record Keeping Requirements

(a) The Permittee shall maintain records of the materials **used in quantities greater than 25 gallons per year** that contain any VOCs. The records shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in condition D.1.1. The records shall contain, as a minimum, the following information:

(5) Operational parameters of the VOC emission control equipment, such as:

1. Data used **at time of initial compliance testing** to establish the capture and destruction (or removal) efficiencies; and

2. Temperature readings.

(b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2.

(1) The amount and VOC content of each **ink, fountain solution, coating and cleaning solvent** used **in quantities greater than 25 gallons per year**. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to **inks and fountain solution** and those used as cleanup solvents;

(2) A monthly log of use;

Response 16

The permittee needs to maintain records of the amount of VOCs used to show compliance with the 326 IAC 8-1-6 (BACT) and 326 IAC 2-8-4 (FESOP). Thus, the record keeping requirements will not change.

The following changes have been made to Condition D.1.8(b)(1).

D.1.8 Record Keeping Requirements

(b) To document compliance with Condition D.1.2**,** the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2.

(1) The amount and VOC content of each **ink, fountain solution,** coating material and **cleaning** solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to ~~coatings~~ **inks and fountain solutions** and those used as cleanup solvents;

Comment 17

The reporting frequency contained in D.1.9 should be revised to be on an annual basis. A reporting requirement of this nature creates an administrative burden that is not commensurate with the environmental risk. The condition should be revised as follows:

D.1.9 Reporting Requirements

An **annual** summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Response 17

Quarterly Reporting is required to document compliance with the permit requirements listed in this permit. 326 IAC 2-8-4(3)(C)(i) gives IDEM the authority to require reports "at least" every six months. The Office of Air Management feels that if reporting was only submitted annually, the possibility for a malfunction of the facilities would not be detected soon enough and would lead to a deviation from the permit requirements. There will be no changes to this condition in the final permit due to this comment.

Comment 18

For the same reasons stated in Comment 11, Conditions D.2.4 and D.2.5 in the construction portion of the permit needs to be revised to reflect the requested limits.

> D.2.4 FESOP Limit [326 IAC 2-8-4] [40 CFR 52.21] [326 IAC 8-1-6]
> The **emissions** of VOC, including **inks, fountain solutions**, and cleaning solvents, in printing press **M6** and printing press **M16** (listed in Section D.1), shall be limited to **25 and 25** tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively. VOC emissions from the printing press M850 and printing press M130 shall be controlled by the regenerative thermal oxidizer, identified as Millenium, which maintains a minimum overall control efficiency of 95.0%. This limit will render the requirements of **326 IAC 2-2 (Prevention of Significant Deterioration), best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements)**, and 326 IAC 2-7 not applicable.
>
> D.2.5 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]
> Any change or modification which would increase the potential to emit VOC from press Mark 16 to twenty-five (25) tons per year or more shall obtain prior approval from IDEM, OAM and shall be subject to the requirements of 326 IAC 8-1-6.

Response 18

Condition D.2.4 lists the FESOP limit for printing presses M850 and M130. Printing presses Mark 6 and Mark 16 do not need to be limited to less than 25 tons per year because their potential to emit is already less than 25 tons per year. The potential to emit of printing presses M850 and M130 is greater than 25 tons per year and thus they will be limited to less than 25 tons per year to comply with the FESOP limit. The following changes will be made to Section D.2.4.

D.2.4 FESOP Limit [326 IAC 2-8-4][326 IAC 8-1-6]

> The usage of VOC, including **inks, fountain solutions** ~~coatings, dilution solvents,~~ and cleaning solvents, in printing press M130 and printing press M850 (listed in Section D.1), shall be limited to ~~152.51~~ **25** and ~~145.69~~ **25** tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively. VOC emissions from the printing press M130 and printing press M850 shall be controlled by the regenerative thermal oxidizer, identified as Millenium, that maintains a minimum overall control efficiency of 95.0%. This limit will render the requirements of 326 IAC 2-7 not applicable.

Comment 19

The preventive maintenance plan requirements in D.2.6 should be revised to reflect that it applies to both the M850 and M130. It should be revised as follows:

> D.2.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]
> A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for printing presses **M850 and** M130 and **their** control device.

Response 19

Section D.2 contains requirements that are applicable to the emission units listed under the facility description box. The facility description box lists M130 but not M850 (M850 is listed in Section D.1). Therefore, Condition D.2.6 mentions only M130. No changes have been made to the permit as a result of this comment.

Comment 20

Condition D.2.8 of the compliance determination requirements should be revised to expand the source of the data to include the suppliers of the significant input materials such as ink, fountain solution, coatings, and cleaning solvents. It should be revised as follows:

> D.2.8 Volatile Organic Compounds (VOC)
> Compliance with the VOC content and usage limitations contained in Condition D.2.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the **ink, fountain solution, and cleaning solvent** manufacturers. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Response 20

The following changes have been made to Condition D.2.8.

D.2.8 Volatile Organic Compounds

> Compliance with the VOC content and usage limitations contained in Condition D.2.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the **ink, fountain solution,** coating**, and cleaning solvent** manufacturer**s**. However, IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Comment 21

Condition D.2.9 of the compliance determination requirements should be revised to include the M130 press. It should be revised as follows:

> D.2.9 VOC Emissions
> The one (1) regenerative thermal oxidizer, identified as Millenium, shall be in operation at all times when the printing presses M850 **and/or M130** are in operation, **except as otherwise provided in this permit, including during periods of oxidizer non-operation caused by emergency conditions**.

Response 21

Section D.2 contains requirements that are applicable to the emission units listed under the facility description box. The facility description box lists M130 but not M850 (M130 is listed in Section D.1). Therefore, Condition D.2.9 mentions only M130.

Please refer to Condition B.14 (Emergency Provisions) for information regarding emergency conditions.

No changes have been made to the permit as a result of this comment.

Comment 22

For the same reasons stated in Comment 15, Conditions D.2.10 in the construction portion of the permit needs to be revised to allow for operational flexibility in setting the temperature at the time of testing.

> D.2.10 Volatile Organic Compound Control
> When operating the printing press M130 (listed in Section D.1) and the printing press M850, the one (1) regenerative thermal oxidizer shall maintain the minimum operating temperature determined in the most recent compliance stack tests to maintain at least 95.0% overall control efficiency. The temperature of the combustion chamber of the thermal oxidizer shall be continuously monitored and recorded whenever any of the facilities are in operation. Compliance with this condition shall deem 326 IAC 8-1-6 satisfied.

Response 22

IDEM, OAM does not feel the need to eliminate the 1600 F minimum operating temperature. OAM feels that 1600 F is a reasonable operating temperature to use until a revised limit is obtained by stack testing. The reason is because in Condition D.2.10 IDEM, OAM is giving Courier the flexibility to be allowed to set the operating temperature at the time of testing so that the 95% destruction efficiency is achieved. This condition is expressed in the first sentence of Condition D.2.10 and states “When operating the printing press M130 and the printing press M850 (listed in Section D.1), the one (1) regenerative thermal oxidizer shall maintain a minimum operating temperature of 1,600ºF or a temperature determined in the most recent compliance stack tests to maintain at least 95.0% overall control efficiency.” No changes have been made to the permit as a result of this comment.

Comment 23

For the same reasons stated in Comment 16, Conditions D.2.11 in the construction portion of the permit needs to be revised as follows:

D.2.11 Record Keeping Requirements

(a) The Permittee shall maintain records of the materials used **in quantities greater than 25 gallons per year** that contain any VOCs. The records shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in condition D.2.4. The records shall contain, as a minimum, the following information:

(5) Operational parameters of the VOC emission control equipment, such as:

(6) Capture efficiency

1. Data used **at the time of initial compliance testing** to establish the capture and destruction (or removal) efficiencies; and

2. Temperature readings.

(b) To document compliance with Condition D.2.5, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.5.

(1) The amount and VOC content of each **ink, fountain solution**, coating and **cleaning** solvent used **in quantities greater than 25 gallons per year**. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A **monthly** log of use;

Response 23

The permittee needs to maintain records of the amount of VOCs used to show compliance with the 326 IAC 8-1-6 (BACT) and 326 IAC 2-8-4 (FESOP). Thus, the record keeping requirements will not change.

The following changes have been made to Condition D.2.11(b)(1).

D.2.11 Record Keeping Requirements

(b) To document compliance with Condition D.2.5, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.5.

(1) The amount and VOC content of each **ink, fountain solution,** coating material and **cleaning** solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

Comment 24

The reporting frequency contained in D.2.12 should be revised to be on an annual basis. A reporting requirement of this nature creates an administrative burden that is not commensurate with the environmental risk. The condition should be revised as follows:

D.2.11 Reporting Requirements
An **annual** summary of the information to document compliance with Conditions D.2.4 and D.2.5 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Response 24

Quarterly Reporting is required to document compliance with the permit requirements listed in this permit. 326 IAC 2-8-4(3)(C)(i) gives IDEM the authority to require reports "at least" every six months. The Office of Air Management feels that if reporting was only submitted annually, the possibility for a malfunction of the facilities would not be detected soon enough and would lead to a deviation from the permit requirements. There will be no changes to this condition in the final permit due to this comment.

Comment 25

It is not clear how the emission limit for the boiler in Section D.3.1 is being expressed. Clarification on the compliance demonstration requirements for the 3 MM Btu/hr boiler is needed.

Response 25

The emission limit for the 3 MMBtu/hr boiler is derived using 326 IAC 6-2-4(a) (Particulate Matter Emission Limitations for Sources of Indirect Heating). The following changes have been made to Condition D.3.1.

D.3.1 Particulate Matter (PM)

~~Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from the 3.0 MMBtu per hour heat input boiler shall be limited to 0.82 pounds per MMBtu heat input.~~

~~This limitation is based on the following equation:~~

~~$Pt = 1.09/Q^{0.26}$~~

~~where: Pt = maximum allowable particulate matter (PM) emitted per MMBtu heat input~~
~~Q = total source max. indirect heater input = 3.0 MMBtu/hr~~

~~$Pt = 1.09/3.0^{0.26} = 0.82$ lbs PM/MMBtu~~

~~Therefore, the PM emissions from the boiler is limited to 0.82 lbs PM/MMBtu~~

Pursuant to 326 IAC 6-2-4(a) (Particulate Matter Emission Limitations for Sources of Indirect Heating), indirect heating units which have 10 MMBtu/hr heat input or less and which began operation after September 21, 1983, shall in no case exceed 0.6 lb/MMBtu heat input. Therefore PM emissions from the 3 MMBtu/hr boiler shall be limited to 0.6 lb/MMBtu heat input.

Comment 26

The HAP emission calculation section in the Technical Support Document should be revised by eliminating hydroquinone as a chemical being released. Hydroquinone is used in film developing, which is an aqueous process and not evaporative, and it is actually consumed in the process of developing film. Its role is to reduce silver halide to silver metal and in the process of reacting with the silver halide, it is oxidized to semiquinone and quinone. Therefore, it only exists in unused film developer and does not evaporate.

Response 26

The HAP emissions were re-calculated and the revised calculation sheet (Page 7 of 8 of TSD Addendum App A) is attached.

Comment 27

As previously described, the enforcement referral (on Page 4 of 9 of the Technical Support Document) incorporates incorrect information. Information in Construction Permit CP-113-9661-00021, indicating that the source had the potential to emit VOC above 100 tons per year, included emissions from two presses (total PTE approximately 50 tons per year) which had been removed from the facility. CP-113-9661-00021 corrected this inaccuracy. A corrected and properly issued permit would have indicated total source emissions well below the 100 ton per year threshold long before the December 1996 FESOP or Part 70 submission deadline. The proposed enforcement action is therefore unwarranted.

Response 27

Courier has submitted an Operation Permit renewal application dated September 2, 1993 which requests operation status from IDEM for printing presses M-16 (Construction Permit PC (57 1793), issued October 3, 1989), M-6 (Registration, December 30, 1987) and Harris V-15 (Registration, August 6, 1986). Printing press ATF (Registration March 21, 1986) is not included in the renewal application since it was not a part of the operation anymore. Courier also submitted a "Bill of Sale" dated June 10, 1996 which indicates that Courier sold one (1) printing press, identified as Harris V-15, located at its Kendallville, Indiana facility. Thus, the technical support document for construction permit, CP-113-9661-00021, issued on July 15, 1998 should not have included the emissions level permitted for this press under the Source Status section. Removing the emissions of printing presses ATF (24 tons/year) and Harris V-15 (24 tons/year) would indicate that the total emissions for the source were 65.07 tons/year. Since the emissions were below 100 tons/year, Courier should not have been required to submit a Title V or FESOP permit by December 1996. The technical support document for construction permit CP-113-9661-00021, issued on July 15, 1998, should have stated the that with the addition of the new printing press M130, the source wide emissions are now above 100 tons/year and that Courier was required to apply for a Title V or FESOP permit within 12 months of issuance of construction permit CP-113-9661-00021. Courier submitted a FESOP application to IDEM on March 27, 2000. Though the FESOP application was submitted after the deadline (July 15, 1999), IDEM, OAM feels that no enforcement action should be taken against Courier because of errors in construction permit CP-113-9661-00021. Thus, the Enforcement Issue section will be removed from the technical support document.

The following revisions have been made to the Technical Support Document under the Enforcement Issue section to reflect the changes (**bolded** language has been added, the language with a ~~line~~ through it has been deleted). The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

~~**Enforcement Issue**~~

~~Pursuant to CP-113-9661-00021, issued on July 15, 1998, the source had the potential to emit VOC above 100 tons per year making it subject to the Part 70 permit program. Also, the source has missed the submission deadline (December 1996) to apply for either a Part 70 or FESOP permit. Thus, an enforcement referral is being included with this permit.~~

On October 6, 2000, Joseph L. Brennan, Vice President of Engineering at Courier submitted additional comments on the proposed FESOP. The summary of the comments and corresponding responses is as follows (bolded language has been added and language with a line through it has been deleted):

Comment A

The third line of the Addendum states that the FESOP is "for the construction and operation of a commercial printing plant that manufactures... bound books." To more clearly describe the nature of the operations supporting the FESOP, we suggest that this wording be changed to "for the construction of an air pollution control device, modification of an existing printing press, and the operation of an existing commercial printing plant that manufactures... books."

Response A

The following changes have been made to the first paragraph of the addendum:

On July 15, 2000, the Office of Air Management (OAM) had a notice published in the News Sun, Kendallville, Indiana, stating that Courier Kendallville, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) for the construction **of an air pollution control device, modification of an existing printing press,** and operation of a**n existing** commercial printing plant that manufactures adhesive bound and saddlewire bound books and performs the following processes: printing, drying, binding and finishing. The notice also stated that OAM proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

Comment B

Response to Comment 11

Courier agrees that the potential to emit for printing presses M6 and M16 is less than 25 tons per year. For the purposes of the FESOP however, we understand it is necessary to affirmatively limit this potential. We therefore request that Section D.1.1 of the FESOP specifically confirm that emissions from presses M6 and M16 will be limited to 25 tons per year ("tpy") each. This can be done by including the first sentence of our proposed revision to this section of the FESOP which states "the emissions of VOC, including inks, fountain solutions, and cleaning solvents, in printing press M6 and printing press M16 (listed in Section D.2) shall be limited to 25 and 25 tons on a twelve (12) consecutive month period, rolled on a monthly basis, respectively." This statement is completely consistent with IDEM's position that the potential to emit for M6 and M16 "is already less than 25 tons per year."

Response B

The potential to emit of printing press M6 and printing press M16 is below 25 tons per year each. Any change or modification which would increase the potential to emit VOC from printing press M6 or printing press M16 to twenty-five (25) tons per year or more shall obtain prior approval from IDEM, OAM and shall be subject to the requirements of 326 IAC 8-1-6. IDEM, OAM does not feel that it is necessary to place limits on printing press M6 or printing press M16 since both presses do not trigger any rules under 326 IAC. No changes have been made to the permit as a result of this comment.

Comment C

The Response to Comment 11 also establishes emissions limits of 25 tpy each on presses M850 and M130. This limit fails to account for the destruction of VOCs from both presses by a common oxidizer with a maximum control efficiency of 95.0%. The proposed limits on the individual presses will severely constrain operational flexibility. Furthermore, the individual press limits are unnecessary as there is a total facility limit that will control emissions. Courier suggests that language from the original comment letter be utilized to require that the press exhaust be ducted to the control device. The language is as follows:

> "VOC emissions from the printing press M850 and printing press M130 shall be controlled by the regenerative thermal oxidizer, identified as Millenium, which maintains a minimum overall control efficiency of 95.0%."

Response C

Printing press M130 and printing press M850 each have the potential to emit VOCs of greater than 25 tons per year. The source is utilizing a thermal oxidizer to control VOC emissions from both printing presses M130 and M850. Furthermore, both the individual presses are subject to 326 IAC 8-1-6 and the use of the thermal oxidizer is being considered to satisfy 326 IAC 8-1-6. Therefore, the 25 tons per year limits will be removed from Section D.1.1.

D.1.1 FESOP Limit [326 IAC 2-8-4][326 IAC 8-1-6]

~~The usage of VOC, including inks, fountain solutions and cleaning solvents, in printing press M850 and printing press M130 (listed in Section D.2), shall be limited to 25 and 25 tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively.~~ VOC emissions from the printing press M850 and printing press M130 **(listed in Section D.2)** shall be controlled by the regenerative thermal oxidizer, identified as Millenium, that maintains a minimum overall control efficiency of 95.0%. This limit will render the requirements of 326 IAC 2-7 not applicable.

Since printing presses M130 and M850 are not limited to 25 tons per year each, the two (2) quarterly reports at the end of this permit will be deleted.

Comment D

Response to Comment 16

In failing to grant our request that Courier only be required to maintain the data used at the time of initial compliance testing to determine capture and destruction efficiency in the oxidizer, IDEM imposes a heavy recordkeeping burden of little benefit. This burden is compounded through IDEM's requirement for the frequent and detailed gathering of material usage information that could be easily provided, with equal validity, through Courier's proposed monthly log of use. Courier requests that IDEM reconsider the need for these substantial burdens, and our proposed modifications to alleviate those burdens, in light of the anticipated benefits. Therefore, the requirements should be revised as follows:

D.1.8 Record Keeping Requirements

(a) The Permittee shall maintain records of the materials used that contain any VOCs. The records shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in condition D.1.1. The records shall contain, as a minimum, the following information:

(1) The weight or volume of VOC-containing material used, including purchase orders and invoices necessary to verify the type and amount used.

(2) The VOC content (weight percent or pound per gallon minus water and exempt compounds) of each material used.

(3) The weight of VOCs emitted for each compliance period, considering capture and destruction (or removal) efficiency.

(4) Operational parameters of the VOC emission control equipment, considering capture and destruction (or removal) efficiency.

(5) Operational parameters of the VOC emission control equipment, such as:

1. Data used to establish the capture and destruction (or removal) efficiencies at the time of initial compliance test; and

2. Temperature readings.

(b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2.

(1) The amount and VOC content of each ink, fountain solutions, coating and cleaning solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A monthly log of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Response D

The following changes have been made to Section D.1.8.

~~D.1.8 Record Keeping Requirements~~

(a) The Permittee shall maintain records of the materials used that contain any VOCs. The records shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in condition D.1.1. The records shall contain, as a minimum, the following information:

(1) The weight of VOC-containing material used, including purchase orders and invoices necessary to verify the type and amount used.

(2) The VOC content (weight and volume percent) of each material used.

(3) The weight of VOCs emitted for each compliance period, considering capture and destruction (or removal) efficiency.

(4) Operational parameters of the VOC emission control equipment, considering capture and destruction (or removal) efficiency.

(5) Operational parameters of the VOC emission control equipment, such as:

~~(1) Capture efficiency;~~

~~(2) Destruction (or removal) efficiency;~~

(~~3~~**1**) Data used to establish the capture and destruction (or removal) efficiencies **at the time of the initial compliance test**; and

(~~4~~**2**) Temperature readings.

(b) To document compliance with Condition D.1.2**,** the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2.

(1) The amount and VOC content of each ink, fountain solution, coating material and cleaning solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to inks and fountain solutions and those used as cleanup solvents;

(2) A **monthly** log of ~~the dates of~~ use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment E

Response to Comment 17

IDEM requires quarterly compliance reporting. However, 326 IAC 2-8-4(3)(c)(i) gives IDEM the authority to require reports no less frequently than once every six months. Courier requests that, to reduce administrative burden, reporting be required every six months as allowed by state regulations.

Response E

326 IAC 2-8-4(3)(C)(i) gives IDEM the authority to require reports "at least" every six months. Currently, all FESOP permits issued by IDEM, OAM are required to submit quarterly reports. IDEM, OAM does not feel that submitting quarterly reports is an administrative burden, rather by submitting quarterly reports any malfunctions or deviations from the permit requirements can be detected and corrective action can be taken to correct any problems. No changes have been made to the permit as a result of this comment.

Comment F

Response to Comment 18. See comment B and C.

Response F

The potential to emit of printing press M6 and printing press M16 is below 25 tons per year each. Any change or modification which would increase the potential to emit VOC from printing press M6 or printing press M16 to twenty-five (25) tons per year or more shall obtain prior approval from IDEM, OAM and shall be subject to the requirements of 326 IAC 8-1-6. IDEM, OAM does not feel that it is necessary to place limits on printing press M6 or printing press M16 since both presses do not trigger any rules under 326 IAC. No changes have been made to the permit as a result of this comment.

Printing press M130 and printing press M850 each have the potential to emit VOCs of greater than 25 tons per year. The source is utilizing a thermal oxidizer to control VOC emissions from both printing presses M130 and M850. Furthermore, both the individual presses are subject to 326 IAC 8-1-6 and the use of the thermal oxidizer is being considered to satisfy 326 IAC 8-1-6. Therefore, the 25 tons per year limits will be removed from Section D.2.4.

D.2.4 FESOP Limit [326 IAC 2-8-4][326 IAC 8-1-6]

~~The usage of VOC, including inks, fountain solutions and cleaning solvents, in printing press M130 and printing press M850 (listed in Section D.1), shall be limited to 25 and 25 tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively.~~ VOC emissions from the printing press M130 and printing press M850 shall be controlled by the regenerative thermal oxidizer, identified as Millenium, that maintains a minimum overall control efficiency of 95.0%. This limit will render the requirements of 326 IAC 2-7 not applicable.

Since printing presses M130 and M850 are not limited to 25 tons per year each, the two (2) quarterly reports at the end of this permit will be deleted.

Comment G

Response to Comment 23. See comment D.

Response G

The following changes have been made to Section D.2.11.

D.2.11 Record Keeping Requirements

(a) The Permittee shall maintain records of the materials used that contain any VOCs. The records shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in condition D.2.4. The records shall contain, as a minimum, the following information:

(1) The weight of VOC-containing material used, including purchase orders and invoices necessary to verify the type and amount used.

(2) The VOC content (weight and volume percent) of each material used.

(3) The weight of VOCs emitted for each compliance period, considering capture and destruction (or removal) efficiency.

(4) Operational parameters of the VOC emission control equipment, considering capture and destruction (or removal) efficiency.

(5) Operational parameters of the VOC emission control equipment, such as:

~~(1) Capture efficiency;~~

~~(2) Destruction (or removal) efficiency;~~

(~~3~~**1**) Data used to establish the capture and destruction (or removal) efficiencies **at the time of the initial compliance test**; and

(~~4~~**2**) Temperature readings.

(b) To document compliance with Condition D.2.5, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.5.

(1) The amount and VOC content of each ink, fountain solution, coating material and cleaning solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A **monthly** log of ~~the dates of~~ use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment H

Response to Comment 24. See comment E.

Response H

Please refer to Response E.

Upon further review, the OAM has decided to make the following revisions to the permit:

1. As part of the U.S. EPA's 1997 Compliance Assurance Monitoring rule making (Federal Register Volume 62, page 54900-54947, Wednesday, October 22, 1997), the language in 40 CFR Part 70.6(c)(5)(iii)(B)) was changed from "continuous or intermittent compliance" to "based on continuous or intermittent data" The U.S. District Court of Appeals, Washington D.C. ruled against EPA's language, saying that the Clean Air Act wording of continuous or intermittent compliance had to be used. (NRDC vs. EPA, #97-1727) This change has been made to this permit to be consistent with state and federal law.

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was ~~based on~~ continuous or intermittent ~~data~~;

(4) The methods used for determining the compliance status of the source, currently

and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAM, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

2. Page 35 of 39 - Emergency/Deviation Occurrence Report Form should be sent to the Air Compliance Branch and not to the Compliance Data Section.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
~~COMPLIANCE DATA SECTION~~ AIR COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Courier Kendallville, Inc.
Source Address: 2500 Marion Drive, Kendallville, Indiana 46755
Mailing Address: 2500 Marion Drive, Kendallville, Indiana 46755
FESOP No.: F113-12093-00021

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) CThe Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and CThe Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-8-4(3)(C) CThe Permittee must submit notice in writing within ten (**10**) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Federally Enforceable Operating Permit (FESOP)

Source Background and Description

Source Name:	Courier Kendallville, Inc.
Source Location:	2500 Marion Drive, Kendallville, Indiana 46755
County:	Noble
SIC Code:	2752
Operation Permit No.:	F113-12093-00021
Permit Reviewer:	Nishat Hydari / EVP

The Office of Air Management (OAM) has reviewed a FESOP application from Courier Kendallville, Inc. relating to the operation of a commercial printing plant that manufactures adhesive bound and saddlewire bound books and performs the following processes: printing, drying, binding and finishing.

History

On March 27, 2000, Courier Kendallville, Inc. submitted an application to the OAM requesting the addition of one (1) Heidelberg sheetfed printing press, one (1) Sheetfed UV coater, one (1) regenerative oxidizer for VOC control; modification of printing press M130 which includes installation of four (4) additional printing units; and replacing the existing Mark 6 printing press with an identical printing press. The source also requested to be granted a FESOP permit.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) heat set web offset lithographic printing press (consisting of two (2) printing units), identified as Mark 16, with a maximum line speed of 1265 feet per minute and a maximum printing width of 35.5 inches;

(b) One (1) heat set web offset lithographic printing press (consisting to four (4) printing units), identified as M850, with a maximum line speed of 1600 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control;

(c) Two (2) natural gas-fired dryers, identified as Hantscho Mark 6 Upper Dryer and Hantscho Mark 6 Lower Dryer, each with a maximum heat input rate of 4.44 million (MM) British thermal units per hour (Btu/hr), exhausting to one (1) stack, identified as 2;

(d) Two (2) natural gas-fired dryers, identified as Hantscho Mark 16 Upper Dryer and Hantscho Mark 16 Lower Dryer, each with a maximum heat input rate of 5.8 million (MM) British thermal units per hour (Btu/hr), exhausting to one (1) stack, identified as 6;

(e) Two (2) natural gas-fired dryers, identified as Harris M130 Upper Dryer and Harris M130 Lower Dryer, each with a maximum heat input rate of 4.0 MMBtu/hr, exhausting to one (1) stack, identified as Oxy 1; and

(f) Two (2) natural gas-fired dryers, identified as Harris M850 Upper Dryer and Harris M850 Lower Dryer, each with a maximum heat input rate of 4.44 MMBtu/hr, exhausting to one (1) stack, identified as Oxy 1.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-8-4(11):

(a) One (1) heat set web offset lithographic printing press (consisting of two (2) printing units), identified as Mark 6, with a maximum line speed of 950 feet per minute and a maximum printing width of 35.5 inches;

(b) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units and the addition of another four (4) printing units), identified as M130, with a maximum line speed of 1264 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control;

(c) One (1) nonheat set sheetfed offset printing press (consisting of four (4) printing units), identified as Heidelberg Sheetfed Press, with a maximum line speed of 1600 feet per minute and a maximum printing width of 40.125 inches;

(d) One (1) sheetfed UV Coater; and

(e) One (1) regenerative thermal oxidizer, identified as Millenium, using natural gas as a supplementary fuel at a maximum heat input rate of 2.29 MMBtu/hr, exhausting through one (1) stack, identified as Oxy 1. The oxidizer has a minimum temperature of 1,600 F and is used to control VOC emissions from units M130 and M850.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(1) Six (6) natural gas-fired space heaters, each with a maximum heat input rate of 0.15 MMBtu/hr;
(2) Two (2) natural gas-fired air make-up units, with a maximum heat input rate of 0.18 MMBtu/hr and 0.15 MMBtu/hr, respectively;
(3) One (1) natural gas-fired boiler, with a maximum heat input rate of 3.0 MMBtu/hr;

(b) The following VOC and HAP storage containers:

(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;

(2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;

(c) Cleaners and solvents characterized as follows:

(1) Having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100 F) or;

(2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 C (68 F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;

(d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;

(e) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;

(f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;

(g) Paved and unpaved roads and parking lots with public access;

(h) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;

(i) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP:

(1) The cleaning solvent used on the UV coater;

(2) One (1) film cleaner used in the plating room;

(j) Any unit emitting greater than 1 pound per day but less than 12.5 pounds per day or 2.5 ton per year of any combination of HAPs:

(1) Two (2) binding operations, identified as Norm and Kolbus, each with a maximum capacity of 560 pound per hour;

(k) Other activities or categories not previously indentified:

(1) Three (3) binding operations, identified as Fox Stitcher, Norm Binder and Kolbus Binder, each with a maximum capacity of 560 pounds of paper per hour;

(2) Two (2) binding operations, identified as Norm and Kolbus, each with a maximum capacity of 560 pounds per hour;

(3) Film processor used to develop black and white film; and

(4) Plate processor used to develop printing plates.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
1	Boiler	22	10 inches	150	340
2	M6 Dryer	27	26 inches	5100	340
3	Norm Binder	24	13 inches	6000	500
Oxy 1	M130 Dryer	32	16 inches	7598	350
Oxy 1	M130 Dryer	32	22 inches	7598	350
Oxy 1	M850 Dryer	32	23 inches	8585	400
Oxy 1	Millenium Oxidizer	32	30 inches	16,755	600 - 650
6	Mark 16 Dryer	34	12 inches	4127	400
7	Cyclone and Baghouse	40.3	11 inches	27,000	Ambient
8	Kolbus Binder	23 (horizontal)	12 inches	6000	500

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) Registration issued December 30, 1987;

(b) PC (57) 1793 issued on October 3, 1989;

(c) CP-113-4556-00021, issued on June 5, 1995;

(d) Registration issued August 6, 1986; and

(e) CP-113-9661-00021, issued on July 15, 1998.

All conditions from previous approvals were incorporated into this FESOP.

Enforcement Issue

Pursuant to CP-113-9661-00021, issued on July 15, 1998, the source had the potential to emit VOC above 100 tons per year making it subject to the Part 70 permit program. Also, the source has missed the submission deadline (December 1996) to apply for either a Part 70 or FESOP permit. Thus, an enforcement referral is being included with this permit.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on March 27, 2000 and June 16, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 8).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.39
PM-10	1.56
SO_2	0.12
VOC	363.20
CO	17.25
NO_x	20.54

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Xylene	3.49
Diethanolamine	0.15
Napthalene	0.07
Cumene	0.10
Hydroquinone	3.38
Glycol Ethers	0.88
TOTAL	8.07

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOCs is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

No previous emission data has been received from the source.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit.

	Limited Potential to Emit (tons/year)							
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	Single HAP	TotalHAPs
Mark 6	0.00	0.00	0.00	23.91	0.00	0.00	0.16	0.16
Mark 16	0.00	0.00	0.00	24.83	0.00	0.00	0.21	0.21
M130*	0.00	0.00	0.00	9.70	0.00	0.00	0.22	0.22
M850*	0.00	0.00	0.00	9.89	0.00	0.00	0.28	0.28
Heidelberg Sheetfed Press	0.00	0.00	0.00	15.14	0.00	0.00	3.49	7.19
Insignificant Activities (Natural Gas Combustion)	0.39	1.56	0.12	1.13	17.25	20.54	0.00	0.00
Total Emissions	0.39	1.56	0.12	84.60	17.25	20.54	3.49	8.06

***** Presses M130 and M850 will be controlled by the thermal oxidizer, Millenium.

County Attainment Status

The source is located in Noble County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Noble County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) The five (5) printing presses identified as Mark 6, Mark 16, M130, M850 and Heidelberg Sheetfed Press, are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart QQ), because the five (5) printing presses are not publication rotogravure printing presses.

(b) The one (1) natural gas fired boiler, is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc), because it has a maximum heat input rate of less than 10 MMBtu/hr..

(c) The five (5) printing presses identified as Mark 6, Mark 16, M130, M850 and Heidelberg Sheetfed Press, are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart KK because the five (5) printing presses are not publication rotogravure, packaging rotogravure or wide-web flexographic printing presses.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it will limit annual VOC emissions to less than the one hundred (100) tons per year rule applicability threshold for Noble County.

326 IAC 2-8-4 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, VOC emissions from the two printing presses (M130 and M850) will be controlled by a regenerative thermal oxidizer which will limit the source-wide VOC emissions to less than 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.

326 IAC 5-1 (Visible Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The two (2) natural gas fired boilers (Boiler 1 and Boiler 2) using no. 2 fuel oil as backup, rated at 67.5 and 45.7 MMBtu per hour, respectively, are subject to the particulate matter limitations of 326 IAC 6-2. Pursuant to this rule, the boilers are limited by the following equation from 326 IAC 6-2-4:

$Pt = 1.09/Q^{0.26}$

where: Pt = maximum allowable particulate matter (PM) emitted per MMBtu heat input
Q = total source max. indirect heater input = 3.0 MMBtu/hr

$Pt = 1.09/3.0^{0.26} = 0.82$ lbs PM/MMBtu

Therefore, the PM emissions from the boiler is limited to 0.82 lbs PM/MMBtu

Compliance calculation:
(0.02 tons PM/yr) * (hr/3.0 MMBtu) * (yr/8,760 hrs) * (2,000 lbs/ton) = 1.5E-3 lbs PM/MMBtu

Actual lbs PM/MMBtu (1.5E-3) is less than allowable lbs PM/MMBtu (0.82), therefore the boiler will comply with the requirements of 326 IAC 6-4.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

(a) The three (3) printing presses, identified as Mark 6, Mark 16 and Heidelberg Sheetfed Press are not subject to the requirements of 326 IAC 8-1-6 because each of the three (3) presses has a total potential to emit VOC of less than 25 tons per twelve (12) consecutive month period. Any change or modification which may increase the potential to emit VOC emissions of any of the three (3) presses to greater than 25 tons per year must be approved by the IDEM, OAM before such change may occur.

(b) The two (2) printing presses, identified as M130 and M850 are subject to the requirements of 326 IAC 8-1-6 because the VOC emissions from each press is greater than 25 tons per year. The thermal oxidizer has been accepted as BACT for the presses.

326 IAC 8-5-5 (Graphic Arts Operations)

The five (5) printing presses (identified as Mark 6, Mark 16, M130, M850 and Heidelberg Sheetfed Press) are not subject to the requirements of 326 IAC 8-5-5, because the five (5) printing presses do not involve packaging rotogravure, publication rotogravure or flexographic printing.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The one (1) regenerative oxidizer for the two (2) printing presses has applicable compliance monitoring conditions as specified below:

(1) The Permittee shall record the combustion chamber temperature of the one (1) regenerative oxidizer, identified as Millenium used in conjunction with the two (2) printing presses, (ID M130 and M850), continuously when the heatset web offset printing presses are in operation when venting to the atmosphere. Unless operated under conditions for which the Preventative Maintenance Plan specifies otherwise, the combustion chamber of the catalytic oxidizer Millenium, shall be maintained at a minimum temperature of 1,600° F, or a temperature established during the latest stack test, and the minimum air flow rate shall be maintained at 12,226 acfm, or an air flow rate established during the latest stack test. The Preventative Maintenance Plan for this unit shall contain troubleshooting contingency and response steps for when the temperature reading is lower than the above mentioned.

These monitoring conditions are necessary because the regenerative oxidizer for the two (2) printing presses, (ID M130 and M850) must operate properly to ensure compliance with 326 IAC 2-8 (FESOP) and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the 1990 Clean Air Act. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) FESOP Application Form GSD-08.

(a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act.

(b) See attached calculations for detailed air toxic calculations (Appendix A, page 7).

Conclusion

The construction and operation of this commercial printing plant that manufactures adhesive bound and saddlewire bound books shall be subject to the conditions of the attached proposed **FESOP No.: F113-12093-00021.**

Appendix A: Emission Calculations

Company Name: Courier Kendallville, Inc.
Address City IN Zip: 2500 Marion Drive, Kendallville, Indiana 46755
CP: 113-12093
Plt ID: 113-00021
Reviewer: Nishat Hydari / EVP

Uncontrolled Potential Emissions (tons/year)

	Emissions Generating Activity						
Pollutant	Printing Press Mark 6	Printing Press Mark 16	Printing Press M130	Printing Press M850	Printing Press Heidelberg Sheetfed Press	Insignificant Acitvities (Natural Gas Combustion)	**TOTAL**
PM	0.00	0.00	0.00	0.00	0.00	0.39	0.39
PM10	0.00	0.00	0.00	0.00	0.00	1.56	1.56
SO2	0.00	0.00	0.00	0.00	0.00	0.12	0.12
NOx	0.00	0.00	0.00	0.00	0.00	20.54	20.54
VOC	23.91	24.83	152.51	145.69	3.73	1.13	351.80
CO	0.00	0.00	0.00	0.00	0.00	17.25	17.25
total HAPs	0.16	0.21	0.22	0.28	1.77	0.00	2.64
worst case single HAP	0.16	0.21	0.22	0.28	0.86	0.00	0.86
Total emissions based on rated capacity at 8,760 hours/year.							

Controlled Potential Emissions (tons/year)

	Emissions Generating Activity						
Pollutant	Printing Press Mark 6	Printing Press Mark 16	Printing Press M130	Printing Press M850	Printing Press Heidelberg Sheetfed Press	Insignificant Activities (Natural Gas Combustion)	**TOTAL**
PM	0.00	0.00	0.00	0.00	0.00	0.39	0.39
PM10	0.00	0.00	0.00	0.00	0.00	1.56	1.56
SO2	0.00	0.00	0.00	0.00	0.00	0.12	0.12
NOx	0.00	0.00	0.00	0.00	0.00	20.54	20.54
VOC	23.91	24.83	9.70	9.91	3.73	1.13	73.21
CO	0.00	0.00	0.00	0.00	0.00	17.25	17.25
total HAPs	0.16	0.21	0.22	0.28	1.77	0.00	2.64
worst case single HAP	0.16	0.21	0.22	0.28	0.86	0.00	0.86
Total emissions based on rated capacity at 8,760 hours/year, after control.							

Appendix A: Emissions Calculations
VOC From Printing Press Operations

Company Name: Courier Kendallville, Inc.
Address City IN Zip: 2500 Marion Drive, Kendallville, Indiana 46755
CP: 113-12093
Plt ID: 113-00021
Reviewer: Nishat Hydari / EVP

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES	MMin^2/YEAR
Mark 6 (Heatset Web Offset)	950	35.5	212710

INK VOCS					
Ink Name Press Id	Maximum Coverage '(lbs/MMin^2)	Weight % Volatiles	Flash Off %	Throughput (MMin^2/Year)	Emissions* (TONS/YEAR)
Ink - Book Black	0.87	37.45%	60.00%	212710	20.79
Ink - PMS Yellow	0.87	37.43%	60.00%	212710	20.78
Fountain Solution	0.07	21.00%	100.00%	212710	1.56
Cleaning solvent (A-60 Odorless)	0.03	96.80%	50.00%	212710	1.54
Cleaning Solvent (LPC)	0.03	4.70%	50.00%	212710	0.07
Misc	0.0001	75.00%	100.00%	212710	0.01

Total VOC Emissions =	**23.91 Ton/yr**

*VOC (Tons/Year) = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year
VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year
NOTE: Flash off % is from EPA Guidance Series "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (Sept. 1993) and EPA Alternative Control Techniques Document: Offset Lithographic Printing (June 1994).
(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emisions from Offset Lithographic Printing (9/93))

Appendix A: Emissions Calculations
VOC From Printing Press Operations

Company Name: Courier Kendallville, Inc.
Address City IN Zip: 2500 Marion Drive, Kendallville, Indiana 46755
CP: 113-12093
Plt ID: 113-00021
Reviewer: Nishat Hydari / EVP

THROUGHPUT

Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin^2/YEAR
Mark 16 (Heatset Web Offset)	1265	35.5	283241

INK VOCS

Ink Name Press Id	Maximum Coverage '(lbs/MMin^2)	Weight % Volatiles	Flash Off %	Throughput (MMin^2/Year)	Emissions* (TONS/YEAR)
Ink - Book Black	0.65	37.45%	60.00%	283241	20.68
Ink - PMS Yellow	0.65	37.43%	60.00%	283241	20.67
Fountain Solution	0.07	21.00%	100.00%	283241	2.08
Cleaning Solvent (A-60 Odorless)	0.03	96.80%	50.00%	283241	2.06
Cleaning Solvent (Impact System)	0.03	2.00%	50.00%	283241	0.04
Cleaning Solvent (LPC)	0.03	4.70%	50.00%	0	0.00
Misc.	0.0001	75.00%	100.00%	283241	0.01

Total VOC Emissions =	**24.83 Ton/yr**

*VOC (Tons/Year) = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year
VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year
NOTE: Flash off % is from EPA Guidance Series "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (Sept. 1993) and EPA Alternative Control Techniques Document: Offset Lithographic Printing (June 1994).
(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emisions from Offset Lithographic Printing (9/93))

Appendix A: Emissions Calculations
VOC From Printing Press Operations

Company Name: Courier Kendallville, Inc.
Address City IN Zip: 2500 Marion Drive, Kendallville, Indiana 46755
CP: 113-12093
Plt ID: 113-00021
Reviewer: Nishat Hydari / EVP

THROUGHPUT

Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin^2/YEAR
M130 (Heatset Web Offset)	1264	37.5	298961

INK VOCS

Ink Name Press Id	Maximum Coverage '(lbs/MMin^2)	Weight % Volatiles	Flash Off %	Thermal Oxidizer Destruction Efficiency %	Throughput (MMin^2/Year)	Emissions* (TONS/YEAR)	Controlled Emissions** (TONS/YEAR)
Ink - Process Black	4	32.99%	60.00%	95.00%	298961	118.35	5.92
Ink - Process Cyan	4	34.57%	60.00%	95.00%	298961	124.02	6.20
Ink - Process Magenta	4	38.33%	60.00%	95.00%	298961	137.51	6.88
Ink - Process Yellow	4	41.72%	60.00%	95.00%	298961	149.67	7.48
Ink - Book Black	4	37.45%	60.00%	95.00%	298961	134.35	6.72
Ink - PMS Yellow	4	37.43%	60.00%	95.00%	298961	134.28	6.71
Fountain Solution	0.07	21.00%	30.00%	95.00%	298961	0.66	0.03
Cleaning Solvent (A-60 Odorless)	0.03	96.80%	50.00%	0.00%	298961	2.17	2.17
Cleaning Solvent (LPC)	0.03	4.70%	50.00%	0.00%	298961	0.11	0.11
Misc	0.0001	75.00%	100.00%	0.00%	298961	0.01	0.01

Total VOC Emissions =	**152.51 Ton/yr**
Total Controlled VOC Emissions =	**9.70 Ton/yr**

*VOC (Tons/Year) = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds
**Controlled VOC (Tons/Year) = (Maximum Coverage pounds per MMin^2 *Weight & volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds) * (1 - thermal oxidizer destruction efficiency)

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year
VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year
NOTE: Flash off % is from EPA Guidance Series "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (Sept. 1993) and EPA Alternative Control Techniques Document: Offset Lithographic Printing (June 1994).
(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emisions from Offset Lithographic Printing (9/93))

Appendix A: Emissions Calculations
VOC From Printing Press Operations

Company Name: Courier Kendallville, Inc.
Address City IN Zip: 2500 Marion Drive, Kendallville, Indiana 46755
CP: 113-12093
Plt ID: 113-00021
Reviewer: Nishat Hydari / EVP

THROUGHPUT

Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin^2/YEAR
M850 (Heatset Web Offset)	1600	37.5	378432

INK VOCS

Ink Name Press Id	Maximum Coverage '(lbs/MMin^2)	Weight % Volatiles	Flash Off %	Thermal Oxidizer Destruction Efficiency %	Throughput (MMin^2/Year)	Emissions* (TONS/YEAR)	Controlled Emissions** (TONS/YEAR)
Ink - Process Black	3	32.99%	60.00%	95.00%	378432	112.36	5.62
Ink - Process Cyan	3	34.57%	60.00%	95.00%	378432	117.74	5.89
Ink - Process Magenta	3	38.33%	60.00%	95.00%	378432	130.55	6.53
Ink - Process Yellow	3	41.72%	60.00%	95.00%	378432	142.09	7.10
Ink - Book Black	3	37.45%	60.00%	95.00%	378432	127.55	6.38
Ink - PMS Yellow	3	37.43%	60.00%	95.00%	378432	127.48	6.37
Fountain Solution	0.07	21.00%	30.00%	95.00%	378432	0.83	0.04
Cleaning Solvent (A-60 Odorless)	0.03	96.80%	50.00%	0.00%	378432	2.75	2.75
Cleaning Solvent (LPC)	0.03	4.70%	50.00%	0.00%	378432	0.13	0.13
Cleaning Solvent (Impact System)	0.03	2.00%	50.00%	0.00%	378432	0.06	0.06
Misc	0.0001	75.00%	100.00%	0.00%	378432	0.01	0.01

Total VOC Emissions =	**145.69 Ton/yr**
otal Controlled VOC Emissions =	**9.91 Ton/yr**

*VOC (Tons/Year) = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

**Controlled VOC (Tons/Year) = (Maximum Coverage pounds per MMin^2 *Weight & volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds) * (1 - thermal oxidizer destruction efficiency)

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

NOTE: Flash off % is from EPA Guidance Series "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (Sept. 1993) and EPA Alternative Control Techniques Document: Offset Lithographic Printing (June 1994).
(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emisions from Offset Lithographic Printing (9/93))

Appendix A: Emissions Calculations
VOC From Printing Press Operations

Company Name: Courier Kendallville, Inc.
Address City IN Zip: 2500 Marion Drive, Kendallville, Indiana 46755
CP: 113-12093
Plt ID: 113-00021
Reviewer: Nishat Hydari / EVP

THROUGHPUT

Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin^2/YEAR
Heidelberg Sheetfed Press (Nonheatset Sheeted Offset)	400	39.5	99654

INK VOCS

Ink Name Press Id	Maximum Coverage '(lbs/MMin^2)	Weight % Volatiles	Flash Off %	Throughput (MMin^2/Year)	Emissions* (TONS/YEAR)
Ink - Process Black	3	5.00%	5.00%	99654	0.37
Ink - Process Cyan	3	5.00%	5.00%	99654	0.37
Ink - Process Magenta	3	5.00%	5.00%	99654	0.37
Ink - Process Yellow	3	5.00%	5.00%	99654	0.37
Ink - PMS	3	18.00%	5.00%	99654	1.35
Fountain Solution (ARS-JP)	0.54	84.05%	5.00%	99654	1.13
Fountain Solution (Emerald JRZ)	0.54	21.00%	5.00%	99654	0.28
Cleaning Solvent (Color Wash 1)	0.05	90.00%	50.00%	99654	1.12
Cleaning Solvent (505 Wash)	0.05	100.00%	50.00%	99654	1.25
Cleaning Solvent (Low VOC MRC)	0.05	100.00%	50.00%	99654	1.25
Cleaning Solvent (Color Wash 2)	0.05	100.00%	50.00%	99654	1.25
Misc	0.0001	75.00%	100.00%	99654	0.00

Total VOC Emissions =	**3.73 Ton/yr**

*VOC (Tons/Year) = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year
VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year
NOTE: Flash off % is from EPA Guidance Series "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (Sept. 1993) and EPA Alternative Control Techniques Document: Offset Lithographic Printing (June 1994).
(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emisions from Offset Lithographic Printing (9/93))

Appendix A: Emissions Calculations
HAPs From Printing Press Operations

Company Name: Courier Kendallville, Inc.
Address City IN Zip: 2500 Marion Drive, Kendallville, Indiana 46755
CP: 113-12093
Plt ID: 113-00021
Reviewer: Nishat Hydari / EVP

UNCONTROLLED POTENTIAL HAP EMISSIONS

Material	Maximum Line Speed (feet/min)	Maximum Print Width (inches)	Maximum Coverage (lbs/MMin^2)	Flash Off %	Weight % Xylene	Weight % Diethanolamine	Weight % Napthalene	Weight % Cumene	Weight % Hydroquinone	Weight % Glycol Ethers	Xylene Emissions (ton/yr)	Diethanolamine Emissions (ton/yr)	Naphthalene Emissions (ton/yr)	Cumene Emissions (tons/yr)	Hydroquinone Emissions (tons/yr)	Glycol Ethers Emissions (ton/yr)
Printing Press Mark 6																
LPC	950	35.5	0.03	50.00%	0.00%	0.00%	0.00%	0.00%	0.00%	10.00%	0.00	0.00	0.00	0.00	0.00	0.16
Printing Press Mark 16																
LPC	1265	35.5	0.03	50.00%	0.00%	0.00%	0.00%	0.00%	0.00%	10.00%	0.00	0.00	0.00	0.00	0.00	0.21
Printing Press M130																
LPC	1264	37.5	0.03	50.00%	0.00%	0.00%	0.00%	0.00%	0.00%	10.00%	0.00	0.00	0.00	0.00	0.00	0.22
Printing Press M850																
LPC	1600	37.5	0.03	50.00%	0.00%	0.00%	0.00%	0.00%	0.00%	10.00%	0.00	0.00	0.00	0.00	0.00	0.28
Heidelberg Sheetfed Press																
Emerald JRZ	1600	40.125	0.54	5.00%	0.00%	0.00%	0.00%	0.00%	7.66%	0.00%	0.00	0.00	0.00	0.00	0.42	0.00
ARS-JP	1600	40.125	0.54	5.00%	0.00%	0.00%	0.00%	0.00%	54.15%	0.00%	0.00	0.00	0.00	0.00	2.96	0.00
Blanket Cleaner 505	1600	40.125	0.05	50.00%	50.00%	0.00%	0.00%	0.00%	0.00%	0.00%	2.53	0.00	0.00	0.00	0.00	0.00
Low VOC Mrc	1600	40.125	0.05	50.00%	15.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.76	0.00	0.00	0.00	0.00	0.00
Color Wash #1	1600	40.125	0.05	50.00%	0.00%	0.00%	1.30%	0.00%	0.00%	0.00%	0.00	0.00	0.07	0.00	0.00	0.00
Ultra Clean # 2	1600	40.125	0.05	50.00%	4.00%	3.00%	0.00%	2.00%	0.00%	0.00%	0.20	0.15	0.00	0.10	0.00	0.00
Total State Uncontrolled Potential Emissions											**3.49**	**0.15**	**0.07**	**0.10**	**3.38**	**0.88**

Total HAPs **8.07 tons/yr**

METHODOLOGY

Uncontrolled HAP Emissions (Tons/Year) = ((Maximum Line Speed (ft/min) * Maximum Print Width (inches) * 12 (inches/ft) * 60 (min/hr) * 8760 (hour/yr)) / 1,000,000) * ((Maximum Coverage (lbs/MMin^2) * flash off (%) * weight % HAP) / 2000 (lbs/ton))

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: Courier Kendallville, Inc.
Address City IN Zip: 2500 Marion Drive, Kendallville, Indiana 46755
CP: 113-12093
Plt ID: 113-00021
Reviewer: Nishat Hydari / EVP

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
46.89	410.8

Facilities	
M6 Dryer 1 and 2	8.88
M16 Dryer 1 and 2	11.6
M130 Dryer 1 and 2	8
M850 Dryer 1 and 2	8.88
Millenium Oxidizer	4.9
Boiler	3
Space Heaters (6)	0.9
Air Make-up Unit	0.18
Air Make-up Unit	0.15
Dryers (Norm binder)	0.4
Total	**46.89**

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.39	1.56	0.12	20.54	1.13	17.25

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).